

# **EXHIBIT A**

**Plaintiffs’ and Defendants’ Proposed Case Schedules**

*N.Z., et al. v. Fenix International Limited, et al.*

Central District of California, Case No. 8:24-cv-01655-FWS-SSC

<b>Event</b>	<b>Plaintiffs’ Proposed Dates</b>	<b>Defendants’ Proposed Dates</b>
Motions to Dismiss	Motion: 7 days after ruling on FNC Responses 35 days after motion Reply: 28 days after response	Motion: 30 days after Plaintiffs file an amended complaint, or 14 days after Plaintiffs notify Defendants they do not intend to amend their complaint, per Court’s October 28 Order Sequencing Dispositive Motions, ECF No. 68 (“October 28 Order”).  Responses: 35 days after motion Reply: 28 days after response
Start of discovery	Day after ruling on Forum Non Conveniens (“FNC”)	Day after ruling on Rule 12 Motions to Dismiss (“MTDs”)
Initial Disclosure Deadline	January 30, 2025	30 days after ruling on MTDs
Deadline to file Motion to Amend Pleadings/Add Parties	Motion: 60 days after ruling on Motions to Dismiss (“MTD”) Responses: 28 days after motion Reply: 21 days after motion	Motion: 60 days after the start of discovery Responses: 28 days after motion Reply: 21 days after motion  Note: This does not affect the schedule found in the Court’s October 28 Order.
Last day to hear Motion to Amend Pleadings/Add Parties	4 weeks after reply deadline	4 weeks after reply deadline
Class Certification Expert Disclosures, including service of expert reports if required	Initial: 240 days after ruling on MTD Rebuttal: 45 days after initial class certification expert disclosures	Initial: 240 days after ruling on MTDs Rebuttal: 45 days after initial class certification expert disclosures

Class Certification Expert Discovery Cutoff	45 days after rebuttal expert disclosures	45 days after rebuttal expert disclosures
Class Certification Motion	Motion: 30 days after class certification expert cutoff Response: 35 days after motion Reply: 28 days after response	Motion: 30 days after class certification expert discovery cutoff Response: 35 days after motion Reply: 28 days after response
Last day to hear Class Certification Motion	4 weeks after the reply deadline	4 weeks after the reply deadline, subject to court's calendar
Fact Discovery Cutoff	45 days after rebuttal expert disclosure	60 days after ruling on Class Certification Motion
Expert Disclosures, including service of expert reports if required	Initial: 60 days after ruling on Class Certification Motion Rebuttal: 45 days after initial expert disclosure	Initial: 7 days after fact discovery cutoff Rebuttal: 45 days after initial expert disclosure
Expert Discovery Cutoff	45 days after rebuttal expert disclosure	45 days after rebuttal expert disclosure
Dispositive and <i>Daubert</i> Motion Deadlines	Motion: same day as discovery cutoff Response: 35 days after motion Reply: 28 days after response	Motion: 30 days after expert discovery cutoff Response: 35 days after motion Reply: 28 days after response
ADR Deadline	Same day as discovery cutoff	3 weeks after dispositive motion reply deadline
Last day to hear Dispositive and <i>Daubert</i> Motions	4 weeks after the reply deadline	4 weeks after the reply deadline, subject to court's calendar
Trial Filings (first round)	60 days after ruling on dispositive and <i>Daubert</i> motions	60 days after ruling on dispositive and <i>Daubert</i> motions
Trial Filings (second round)	30 days after Trial Filings (first round)	30 days after Trial Filings (first round)
Pretrial Conference	TBD by the Court	TBD by the Court
Trial	TBD by the Court	TBD by the Court